

May 2, 2002



Marlene H. Dortch
Secretary
Federal Communications Commission
TW-A325
445 Twelfth St., SW
Washington, DC 20554

Re: *Ex parte* presentation in: MM Docket No. 01-235

Dear Ms. Dortch:

On May 1, 2002, Mark Cooper, Director of Research, Consumer Federation of America, Andrew Jay Schwartzman, President, Media Access Project (MAP), and Harold Feld, Associate Director, MAP, met with Royce Sherlock, Media Bureau (MB), Debra Sabourin, MB, Roger Holberg, MB, John Scoll, MB, Paul Gallant, MB, Jim Bird, Office of General Counsel (OGC), Nandan Joshi, OGC, Mani Baghdadi, MB, William Johnson, MB.

Mr. Cooper presented a Powerpoint presentation elaborating on arguments contained in previously filed comments in this docket. The Powerpoint presentation he employed accompanies this submission.

In the course of the presentation, staff raised questions about the appropriate metric for measuring broadcast stations' influence. Mr. Cooper expressed the view that advertising volume is not a good measure, as it does not address the marketplace of ideas. He urged use of voice test weighted by HHI indices.

Mr. Schwartzman addressed the relationship between content-based, viewpoint neutral program mandates and structural rules, pointing out that the Commission's unwillingness to embrace the former, even though they are arguably mandated by Section 315(a), necessitates more stringent ownership limits. He also argued that the evidence indicates that when ownership rules have been relaxed, licensees do not deploy the cost savings into new or improved local programming. If the Commission is to permit greater concentration, he said, the Commission must take steps to insure that promised benefits are in fact delivered.

In one on one discussions with Ms. Sabourin, Messrs. Schwartzman, Feld and Cooper pointed out that *Associate Press* and *Red Lion* are good law, that Congress has directed the FCC to insure that underserved audiences are not ignored, and that the public interest requires providing more than just what draws the largest audiences.

In accordance with Section 1.1206(b), 47 C.F.R. § 1.1206, this letter is being filed electronically with your office today.

Sincerely,

Harold Feld
Associate Director

cc: Royce Sherlock
Debra Sabourin
Roger Holberg
John Scoll
Paul Gallant
Jim Bird
Nandan Joshi
Mani Baghdadi
William Johnson

ATTACHMENT



Consumer Federation of America

PRESERVING DEMOCRATIC DISCOURSE IN THE DIGITAL INFORMATION AGE

Dr. Mark N. Cooper

Director of Research

Consumer Federation of America

PRESENTATION MATERIALS

Future of Consumer, Internet and Phone Communications
Consumer Assembly

March 14, 2002

Why Diversity And Competition In News Reporting Matters:

The Case For Retention Of The FCC Newspaper/Broadcast Ownership Rule
Department Of Professional Employees, AFL-CIO
March 15, 2002

BACKGROUND

_ RECENT COURT OF APPEALS DECISIONS

Overtaken long-standing limitations on the ability of a single company to own different media outlets

_ FCC DEREGULATORY AGENDA

Chairman Powell argues the we no longer need the public interest standard of the Communications Act for the mass media, excess concentration can be handled as a purely economic issue under the anti-trust laws.

OPENS THE DOOR TO.....

_ DRAMATIC INCREASE IN MEDIA OWNERSHIP CONCENTRATION

_ END OF OPEN COMMUNICATIONS NETWORKS

WE HAVE A DIFFERENT VIEW.

We need more diverse and accessible media to meet the needs of an increasingly diverse and mobile population in an increasingly connected world.

THEMES

_ UNDERSTANDING THE UNIQUE NATURE AND IMPORTANCE OF CIVIC DISCOURSE

_ AN INCREASINGLY DIVERSE NATION IN AN INCREASINGLY COMPLEX,

INTERCONNECTED WORLD

_ THE CONTINUING IMPORTANCE OF TV AND NEWSPAPERS AS MAJOR MASS MEDIA

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_ CONCENTRATION AND MASS MEDIA MARKET FAILURE

_ MEDIA MERGER MANIA MAKES MATTERS WORSE

_ STRUCTURAL LIMITS PROMOTE DIVERSITY AND ANTAGONISM IN THE MAJOR MASS MEDIA

_ PUBLIC OPINION BASES FOR POLICY ACTIVITY

UNDERSTANDING THE UNIQUE IMPORTANCE OF CIVIC DISCOURSE

THE WIDEST POSSIBLE DISSEMINATION OF INFORMATION FROM DIVERSE AND ANTAGONISTIC SOURCES

“The First Amendment rests... on the assumption that the widest possible dissemination of information from diverse and antagonistic

sources is essential to the welfare of the public, that a free press is a condition of a free society.

Surely a command that the government itself shall not impede the free flow of ideas does not afford non-governmental combinations a refuge if they impose restraints upon that constitutionally guaranteed freedom. Freedom to publish means freedom for all and not for some.”

-- *Justice Black*

NOT PEANUTS OR POTATOES

“[I]n addition to being a commercial enterprise, [the press] has a relation to the public interest unlike that of any other enterprise pursued for profit. A free press is indispensable to the workings of our democratic society. The business of the press... is the promotion of truth regarding public matters by furnishing the basis for an understanding of them. Truth and understanding are not wares like peanuts and potatoes. And so, the incidence of restraints upon the promotion of truth through denial of access to the basis for understanding calls into play considerations very different from comparable restraints in a cooperative enterprise having merely a commercial aspect.”

-- *Justice Frankfurter*

AN ACTIVE PEOPLE

Those who won our independence believed that the final end of the State was to make men free to develop their faculties; . . . that the greatest menace to freedom is an inert people; that public discussion is a political duty; and that this should be a fundamental principle of American government

-- *Justice Brandies*

DIVERSITY OF POINTS OF VIEW

“The newspaper industry... serves one of the most vital of all general interests: the dissemination of news from as many different sources, and with as many different facets and colors as is possible.

That interest is closely akin to, if indeed it is not the same as, the interest protected by the First Amendment; it presupposes that right conclusions are more likely to be gathered but of a multitude of tongues, than through any kind of authoritative selection. To many this is, and always will be, folly; but we have staked upon it our all.”

-- *Justice Hand*

A BROAD AND AGGRESSIVE CONSTITUTIONAL MANDATE FOR CIVIC DISCOURSE IS STILL THE LAW OF THE LAND.

THE COMMUNICATIONS ACT REFERS TO THE PUBLIC INTEREST 112 TIMES.

‘If you do not like what is on the tube, turn it off,’ may be perfectly acceptable in the commercial marketplace where consumers are encouraged to vote with their dollars and not vote (buy), but it is not acceptable for citizens to be turned off by the poor quality of civic discourse. The public interest demands policies that actively promote vigorous civic discourse.

THE NEEDS OF CITIZENS CANNOT BE REDUCED TO THE NEEDS OF CONSUMERS.

The objective of the commercial marketplace is to improve efficiency that produces profit.

The objective of the marketplace of ideas is to promote diversity and antagonism that produces participation and understanding. When competition in the commercial market can help to meet both sets of needs it should be relied upon. When the two come into conflict, preserving “the widest possible dissemination” in the marketplace of ideas and promoting the public interest should take precedence.

POLICY SHOULD PROMOTE THREE TYPES OF DIVERSITY

Ownership Diversity – A society’s capacity to maintain its democratic bearings or its ability to resist manipulation of public opinion is served by a broad distribution of expressive media-based power.

Viewpoint Diversity – There is a strong tendency for global and national media, which maximize profit by presenting programming attractive to national audiences and national advertisers, to squeeze out local, minority and unpopular points of view.

Institutional Diversity – Different types of media, with different cultural and journalistic traditions and different business models, play a special role in promoting civic discourse by providing unique perspectives. A narrow view that all media information is interchangeable fails to recognize the unique role of newspaper reporting as a fourth estate, with an investigative tradition of checking waste, fraud, and abuse of power by governments and corporations.

**AN INCREASINGLY DIVERSE NATION IN AN INCREASINGLY
COMPLEX, INTERCONNECTED WORLD**

**THE TYPICAL HOUSEHOLDS HAS CHANGED DRAMATICALLY IN THE
PAST THREE DECADES, SINGLES AND BLACKS, HISPANICS AND
ASIANS NOW PREDOMINATE**

MARRIED WHITE MALES

Source: U.S. Bureau of the Census, *Statistical Abstract of the United States: 2001* (U.S. Department of Commerce, 2001), Table 50. *Statistical Abstract of the United States: 1986*, p. 35. Hispanic

and Asian household make-up is held constant between 1970 and 1980. **THE U.S. HAS BECOME DEEPLY EMBEDDED IN THE WORLD ECONOMY AND THE FLOW OF PEOPLE TO AND FROM THE U.S. HAS INCREASE DRAMATICALLY**

Source: U.S. Bureau of the Census, *Statistical Abstract of the United States: 2001* (U.S. Department of Commerce, 2001), Table 1, 647, 1258, 1259, 1297. *Statistical Abstract of the United States: 1986*, p. 406, 407.

**FOREIGN-BORN, NON-CITIZENS RESIDENT IN THE U.S. HAVE
INCREASED FROM 5% TO 10% OF THE POPULATION AND THE
MOST FREQUENT COUNTRIES OF ORIGIN HAVE SHIFTED FROM
EUROPE TO ASIA AND LATIN AMERICA**

EUROPEAN ORIGIN

Source: U.S. Bureau of the Census, U.S. Department of Commerce, *Population Profile of the United States: 1999*, Chapter 17.

QUALITATIVE CHANGES IN THE MEDIA PUT CITIZENS AT A DISADVANTAGE

MEDIA HAVE BECOME MUCH MORE POTENT, COMBINING IMMEDIACY AND IMPACT WITH INTERACTIVITY

Dramatic increases in the ability to control and target messages and track media use could result in a greater ability to manipulate and mislead rather than educate and enlist citizens in a more intelligent debate.

MEDIA COMPANIES HAVE BECOME HUGE CORPORATIONS

As corporate scale dwarfs individual resources, citizens are cut off from the means of communications. The size of media organizations presents a growing mismatch between those in control and average citizens. The focus on the corporate bottom line erodes the commitment to journalistic values, which makes them less responsive to citizen needs.

MEDIA COMPANIES HAVE BECOME MULTINATIONAL CONGLOMERATES

Local issues that deeply affect the quality of life (school boards, health and public safety decisions, economic development, bond issues) do not command the attention of multinational giants. The locus of decision making in these huge corporate entities is far removed from the communities in which people live.

THE CONTINUING IMPORTANCE OF TV AND NEWSPAPERS AS MAJOR MASS MEDIA

TV STILL DOMINATES

TV is the most frequent source of news, especially for breaking stories, and commands the largest amount of attention for news-gathering, but many stations do not have newsrooms. It is also the dominant vehicle for political advertising.

NEWSPAPERS ARE SPECIALIZED

Newspapers are still the second most frequent source of news. They provide in-depth reporting and are the primary source of local news.

RADIO HAS BECOME A MUCH LESS IMPORTANT

INFORMATION VOICE

Radio has declined sharply as a primary source of news. Most radio stations have no newsrooms and those that do have very small staffs. The talk show format has become popular.

THE INTERNET IS A WONDERFUL PRODUCTIVITY DEVICE, BUT IT IS NOT YET MASS MEDIA

While time on-line has increased, most is devoted to daily activities (e-mail, chat and shopping), not gathering news and information. Web site visits are very short. News on-line tends to be an electronic version of news off-line produced by the same TV and newspapers that dominate the mass media. Local content is limited. The Internet is becoming increasingly dominated by the same corporate entities that dominate the mass media and access to the Internet is being closed down and walled in by those corporations.

**TV AND NEWSPAPERS ARE THE PREDOMINANT SOURCE OF NEWS
AND INFORMATION**

Source: Regular – Roper, *America's Watching: 30th Anniversary 1959-1989*.

**THE INTERNET HAS GROWN AS A SOURCE OF NEWS AND
INFORMATION, BUT HAS NOT DISPLACED THE MAJOR MEDIA**

Source: Roper Reports.

**NEWSPAPERS AND TV ARE THE MOST RECOGNIZED AND TRUSTED
SOURCES OF NEWS. THE INTERNET HAS NOT YET ARRIVED.**

Source: Pew Research Center, Internet Sapping Broadcast News Audience, June 11, 2000

TV PREDOMINATES IN ANNOUNCING BREAKING NEWS, AS WELL AS FOR FOLLOW-UP. THE ROLE OF NEWSPAPERS EMERGES IN LONGER-TERM FOLLOW-UP. RADIO PLAYS A SMALL ROLE IN ANNOUNCEMENT AND VERY LITTLE ROLE IN FOLLOW-UP.

Source: UCLA Center for Communications, February 8, 2002.

**RECENT CHANGES REINFORCE EMERGING PATTERNS, WITH
NEWSPAPERS AND TV DOMINANT. THE INTERNET IS GROWING,
WHILE RADIO LAGS BEHIND**

Source: Roper Reports, *Consuming More News and Believing It Less*, February 28, 022.

**VIEWING SHIFTS FROM OVER-THE-AIR TO THROUGH-THE-WIRE,
BUT THE SOURCES ARE MUCH THE SAME**

Source: Pew Research Center, Internet Sapping Broadcast News Audience, June 11, 2000

**NEWSPAPERS ARE UNIQUELY ORIENTED TOWARD NEWS
GATHERING AND INFORMATION, NOT ENTERTAINMENT**

Source: Roper Reports, 01-2, 2001, p. 159.

**ONLY HALF OF ALL TV STATIONS HAVE A NEWSROOM AND THE
STAFF IS LESS THAN HALF AS LARGE AS THE AVERAGE
NEWSPAPER STAFF**

Source: Vernon Stone, News Operations at U.S. Radio Stations, News Operations at TV Stations; U.S. Bureau of the Census, Statistical Abstract of the United States: 2000 Tables 2, 37, 932; George, Lisa, *What's Fit to Print: The Effect of Ownership Concentration on Product Variety in Daily Newspaper Markets* (2001); *Editor and Publisher, International Yearbook*, various issues, Federal Communications Commission, *Notice of Proposed Rulemaking, In the Matter of Cross-*

CONCENTRATION AND MARKET FAILURE OF THE MAJOR MASS MEDIA

If pure economics are allowed to determine media market structures, they will not be vigorously competitive, fail to produce the “optimal” output of information products, and leave the information needs of many groups and individuals in society underserved.

CONCENTRATED OWNERSHIP THREATENS CIVIC DISCOURSE

Ownership matters because media owners exercise editorial control, choosing staffs, establishing philosophy and orientation, setting commercial goals, and at key moments, deciding policy. Concentration matters because owners can use (dissipate) monopoly rents to influence content and policy.

TYRANNY OF THE MAJORITY CAUSES MINORITY AND UNPOPULAR VIEWS TO BE UNDERSERVED

Profit maximization in increasingly centralized, commercial media conglomerates promotes standardized, lowest common denominator products that systematically exclude minority audiences, eschew controversy, and avoid culturally uplifting but less commercially attractive content. The presence of advertising makes matters worse, driving the media toward “happy news.”

THE “PUBLIC GOOD” QUALITY OF INFORMATION IS UNDERMINED

Positive externalities of watchdogs and other information public goods are undervalued and under supplied. Institutional diversity, particularly less-commodified information, is undermined.

**THE SIZE OF THE AUDIENCE AND ITS DIVERSITY HAVE GROWN
MUCH MORE QUICKLY THAN MAJOR MEDIA OUTLETS, WHILE
THE NUMBER OF OWNERS HAS DECLINED SHARPLY**

Source: Households, U.S. Bureau of the Census, Statistical Abstract of the United States: 2001 Table 54; U.S. Bureau of the Census, Statistical Abstract of the United States: 1986 Table 59; George, Lisa, *What's Fit to Print: The Effect of Ownership Concentration on Product Variety in Daily Newspaper Markets* (2001); Outlets and owners, *Editor and Publisher, International Yearbook*, various issues, Federal Communications Commission, *Notice of Proposed Rulemaking, In the Matter of Cross-Ownership of Broadcast Stations and Newspaper Newspaper/Radio Cross-Ownership Waiver Policy*, MM Docket No. 01-235, MM Docket No. 96-197

**BOTH TV AND NEWSPAPERS HAVE EXPERIENCED A SHARP
INCREASES IN CONCENTRATION OF OWNERSHIP**

Source: Federal Communications Commission, *In the Matter of Cross-Ownership of Broadcast Stations and Newspapers; Newspaper-Radio Cross-Ownership Waiver Policy: Order and Notice of Proposed Rulemaking*, MM Docket No. 01-235, 96-197, September 20, 2001. George, Lisa, *What's Fit to Print: The Effect of Ownership Concentration on Product Variety in Daily Newspaper Markets* (2001); *Editor and Publisher, International Yearbook*, various issues.

**CONSUMERS AND CITIZENS ARE BEST SERVED BY NON-
CONCENTRATED, COMPETITIVE MARKETS, PRODUCERS PREFER
MORE CONCENTRATED – MONOPOLY, DUOPOLY AND TIGHT-
OLIGOPOLY – MARKETS**

DESCRIBING MARKET STRUCTURE FOR PUBLIC POLICY ANALYSIS

DEPARTMENT OF JUSTICE MERGER GUIDELINES	TYPE OF MARKET	EQUIVALENTS IN TERMS OF EQUAL SIZED FIRMS	HHI	4-FIRM SHARE
Highly Concentrated	Monopoly	1 (with 65% or more)	5300+	100
	Duopoly	2	3000+	100
	Tight Oligopoly	6	1800 1667	60
Moderately Concentrated	Loose Oligopoly	10	1000	40
Unconcentrated				
	Atomistic Competition	50	200	8

Sources: U.S. Department of Justice, *Horizontal Merger Guidelines*, revised April 8, 1997, for a discussion of the HHI thresholds; Shepherd, William, G., *The Economics of Industrial Organization* (Prentice Hall, Englewood Cliffs, N.J., 1985), for a discussion of 4 firm concentration ratios.

LOCAL MEDIA MARKETS ARE HIGHLY CONCENTRATED

Source: TV: Calculated from BIA Financial, *Television Market Report: 2000*; Newspapers: See Reply Comments of Consumer Federation of America, et al; In the Matter of Cross-Ownership of Broadcast Stations and Newspapers; Newspaper-Radio Cross-Ownership Waiver Policy: Order and Notice of Proposed Rulemaking, MM Docket No. 01-235, 96-197, February 15, 2002 and George, Lisa, *What's Fit to Print: The Effect of Ownership Concentration on Product Variety in Daily Newspaper Markets* (2001); Cable: Federal Communications Commission, *In the Matter of Annual Assessment of Competition in markets for the Delivery of Video Programming*, Docket No. 01-129, January 14, 2002; High Speed Internet: Industry Analysis Division, *High-Speed*

Services for Internet Access: Subscribership as of June 30, 2001 (Common Carrier Bureau, Federal Communications Commission, February 2002), Table 1

**NEWSPAPER MARKETS ARE MUCH MORE CONCENTRATED WHEN
VIEWED AT THE COUNTY LEVEL, WHICH IS A MORE
APPROPRIATED GEOGRAPHIC UNIT OF ANALYSIS**

Sources: Eileen Davis Hudson and Mark Fitzgerald, "Capturing Audience Requires a Dragnet," *Editor and Publisher*, October 22, 2001, p. 20. Los Angeles is used as an example because it is the third least concentrated (for newspapers) of and DMA in the country and the five counties identified above account for 95 percent of the households in the DMA. The HHI is 2400 when calculated on a DMA wide basis but averages 4000, when calculated on a county-by-county basis.

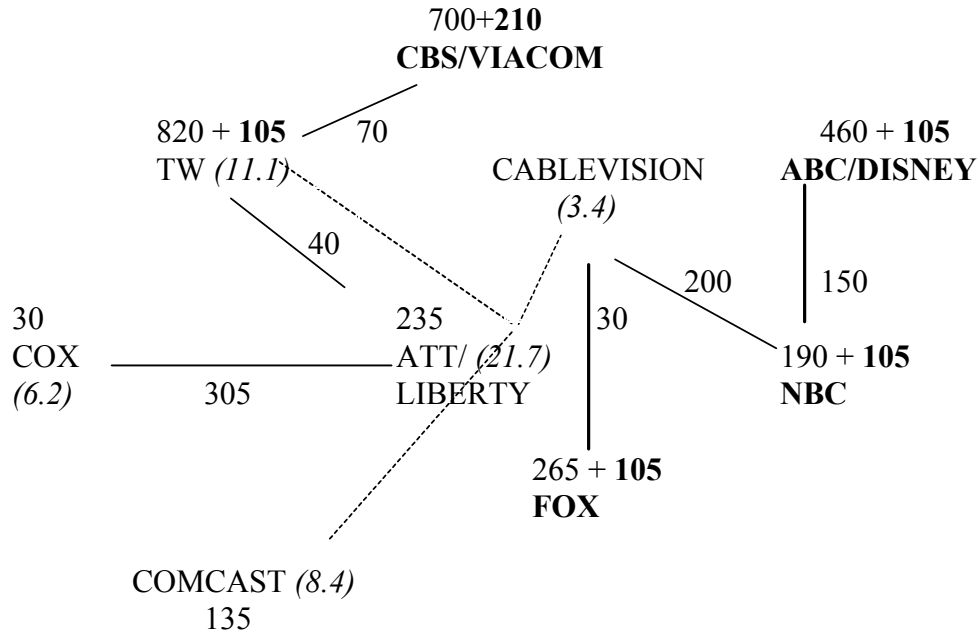
IN SPITE OF THE GROWTH OF CHANNELS AND DELIVERY TECHNOLOGIES (BROADCAST, CABLE, SATELLITE), THE VIDEO PROGRAMMING MARKET IS DOMINATED BY A HANDFUL OF HUGE COMPANIES,

DOMINANT VIDEO PROGRAM PRODUCERS/DISTRIBUTORS

	SUBSCRIBERS		WRITING BUDGET		
	#	%	#	%	
	(million)				
AOL – TIME WARNER	935	15.6	\$206	16.8	
CBS/VIACOM	910	15.1	145	11.8	
ABC/DISNEY	705	11.8	132	10.8	
ATT/LIBERTY	540	9.0	106	8.6	
NBC		495	8.3	53	4.4
FOX		<u>400</u>	<u>6.6</u>	<u>130</u>	<u>10.6</u>
Subtotal	3985	66.4	772	63.0	
TOTAL	6000	100.0	1225	100.0	

SOURCES: Federal Communications Commission, In the Matter of Annual Assessment of the Status of Competition in Markets for the Delivery of Video Programming, CC Docket No. 00-132, Seventh Report, Table D-1, D-2, D-3, D-6, D-7, from BIA Financial, *Television Market Report: 2000*; Comments of the Writers Guild of America, *National Cable Horizontal Ownership Limit FNPRM*, CS Docket Nos. 98-82 *et al.*, FCC 01-263, January 4, 2002. Subscribers are computed as Cable networks = Millions of Subscribers, total is 4.9 billion. Each broadcast network (in bold) is set at all TV households 105. Total broadcast networks “subscribers” is 1.17 billion (# of independent owners in each DMA times TV households per DMA). Subscribers in joint ventures are attributed to the larger partner.

THE DOMINANT VIDEO PRODUCERS COMBINE OWNERSHIP OF DISTRIBUTION WITH PROGRAMMING AND ARE INTERTWINED IN JOINT VENTURES



Sources: See previous exhibit. Regular text indicates cable program “subscribers.” Solid arrows point in the direction in which subscribers are attributed to owners. Bold indicates broadcast network “subscribers.” Broken arrows indicate joint ownership of distribution systems. Italics indicate cable television system monthly subscribers.

MEDIA MERGER MANIA WOULD MAKE MATTERS MUCH WORSE

PAST DECISIONS TO RELAX RULES HAVE QUICKLY RESULTED IN

Merger waves in TV and radio

Concentration of programming

Diminution of public interest programming, especially news coverage.

REPEAL OF CURRENT OWNERSHIP LIMITS WOULD ALLOW THE NUMBER OF OWNERS TO SHRINK TO EXTREMELY LOW LEVELS

Nationally fewer than 300

Most local markets would have a handful (the equivalent of six or less, equal-sized)

ONGOING NEGATIVE QUALITATIVE CHANGES IN MEDIA MARKETS WOULD BE SUBSTANTIALLY EXACERBATED BY THE MERGER WAVE

Corporate bottom line mentality drives out quality (the Night Line Syndrome)

National focus squeezes out local content

Cross-Ownership destroys journalistic values (repurposing, and boosterism) and undermines the watchdog role

IF YOU LET THEM, THEY WILL MERGE
RELAXING THE RULES ON TV (AND RADIO) QUICKLY RESULTS IN
A MERGER WAVE

Source: Calculated from BIA Financial, *Television Market Report: 2000*; See Reply Comments of Consumer Federation of America, et al; In the Matter of Cross-Ownership of Broadcast Stations and Newspapers; Newspaper-Radio Cross-Ownership Waiver Policy: Order and Notice of Proposed Rulemaking, MM Docket No. 01-235, 96-197, February 15, 2002.

THE NUMBER OF OWNERS HAS DECLINED SHARPLY AND WOULD BE SLASHED BY MORE THAN HALF, AS THE RESULT OF A MERGER WAVE MADE POSSIBLE BY THE RELAXATION OF CURRENT RULES

Source: Federal Communications Commission, *In the Matter of Cross-Ownership of Broadcast Stations and Newspapers; Newspaper-Radio Cross-Ownership Waiver Policy: Order and Notice of Proposed Rulemaking*, MM Docket No. 01-235, 96-197, September 20, 2001. George, Lisa, *What's Fit to Print: The Effect of Ownership Concentration on Product Variety in Daily Newspaper Markets* (2001); *Editor and Publisher, International Yearbook*, various issues. TV-News assumes 80 percent of all newspapers enter into cross ownership relations with TV stations, per duopoly rule behavior. Assumes that the networks would acquire affiliates in 80

percent of the markets where acquisitions would be allowed. This would mean buying out 110 stations each and reducing the number of independent owners from 360 to 250.

**ELIMINATION OF THE OWNERSHIP RESTRICTIONS WOULD
RENDER VIRTUALLY ALL MAJOR MASS MEDIA MARKETS HIGHLY
CONCENTRATED AND CREATE MANY MONOPOLY OR DUOPOLY
MARKETS**

Source: See previous exhibit.

STRUCTURAL LIMITS ARE THE CONSTITUTIONALLY PREFERRED MECHANISM TO PROMOTE DIVERSITY AND ANTAGONISM IN THE MAJOR MASS MEDIA

We cannot tell people what or what not to say or listen to, but we can indirectly increase the probability that people participate in a richer civic discourse.

Structural policy can make it easier for people to hear louder voices spoken in languages they understand addressing topics that are interesting and important to them.

By enabling these messages to appear in places they might not normally be heard, this discourse helps mobilize those directly affected and exposes all citizens to more diverse ideas.

THREE TYPES OF DIVERSITY SHOULD BE PROMOTED BY STRUCTURAL LIMITS ON THE MASS MEDIA

Ownership – More owners than simple economics would dictate

Viewpoint – Promote local and minority points of view

Institutional – Ensure independence of different institutional types

SMALLER SCALE MEDIA SHOULD BE PROMOTED

We should not “trade” structural limits on major mass media for more responsive and accessible localized community media. We must layer both types of media atop one another to meet the increasing needs of citizens for information and forms of expression in the information age.

Policies to promote diversity in the major mass media should be augmented by policies to ensure the vibrancy of other media – low power TV and radio and the Internet – that hold the promise of easier access, more direct participation, and greater responsiveness to citizens.

PUBLIC OPINION BASES FOR POLICY ACTIVITY

BY A WIDE MARGIN,

**THE PUBLIC PERCEIVES MEDIA AND COMMUNICATIONS
MERGERS AS HARMFUL**

- _ REDUCING NEWS COVERAGE**
- _ REDUCING EDITORIAL DIVERSITY**
- _ RAISING PRICES**
- _**
- _ LOWERING QUALITY**

AND OPPOSES MERGERS

